

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
Criminal No. 17-12 (DSD/BRT)

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United States of America,

Plaintiff,

v.

Ian Scot Laurie,

**MOTION TO SUPPRESS  
PRE-INDICTMENT INVOCATION  
OF RIGHT TO COUNSEL AND  
RIGHT TO REMAIN SILENT**

Defendant.

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The Defendant in the above-captioned matter, Ian Scot Laurie, by and through the undersigned counsel, respectfully moves the Court for an order suppressing any and all evidence relating to the Defendant's invocation of counsel and/or exercise of his right to remain silent prior to the issuance of the indictment against him, unless and until the Defendant's credibility is put into issue, and then only for impeachment purposes. Such evidence is irrelevant and inadmissible under Rule 403 of the Federal Rules of Evidence, and would violate due process and the Defendant's guarantees under the Fifth and Sixth Amendments, and case law thereunder, to counsel and remain silent. *Doyle v. Ohio*, 426 U.S. 610, 618 (1976); *Jenkins v. Anderson*, 447 U.S. 231, 238 (1980); *Kirby v. Illinois*, 406 U.S. 682, 691 (1972) (right to counsel does extend to some pre-indictment situations, when necessary to "protect[ ] [a suspect] from prejudicial procedures").

This motion is based upon the files, records, and proceedings herein, as well as any additional matters that may be presented prior to or at the time of the hearing of said motion.

Respectfully submitted,

BRUNO LAW, PLLC

Dated: October 12, 2017

By /s/ Frederic Bruno  
Frederic Bruno, Attorney ID 123213  
Attorney for Defendant  
5500 Wayzata Boulevard, Suite 1000  
Minneapolis, MN 55416  
(763) 545-7900  
[bruno@brunolaw.com](mailto:bruno@brunolaw.com)